

EXHIBIT 20

CAPTAIN NICHOLAS J. LEWIS
MATTER OF COEYMANS MARINE TOWING, LLC

August 13, 2025

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 Norfolk Division
4 In Admiralty

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6 CIVIL ACTION NO: 2:24-cv-00490

7 In the Matter of COEYMANS MARINE
8 TOWING, LLC D/B/A CARVER MARINE
9 TOWING as Owner and Operator of M/T
10 Mackenzie Rose, (IMO No. 8968765) her cargo,
11 engines, boilers, tackle, equipment, apparel, and
12 appurtenances, etc., in rem, petitioning for
13 Exoneration from or Limitation of Liability in
14 allision with Norfolk and Portsmouth Belt Line
15 Railroad Company Main Line Railroad Bridge
16 occurring June 15, 2024 in and about the
17 Elizabeth River, Virginia.

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19 DEPOSITION OF
20 CAPTAIN NICHOLAS J. LEWIS

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22 Taken on Behalf of the Claimant

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24 DATE TAKEN: August 13, 2025
25 TIME: 12:00 p.m. - 5:15 p.m.
PLACE: 6767 N. Wickham Road
Melbourne, Florida

Examination of the witness taken before:

Yvette S. Harrison, RPR, FPR,
Court Reporter
and Notary Public, State of Florida at Large.

CAPTAIN NICHOLAS J. LEWIS
MATTER OF COEYMANS MARINE TOWING, LLC

August 13, 2025
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1 Q. And your review of documents and his later
2 statement concluded that either he didn't do both, press
3 the button or turn the switch or he pressed the button
4 and didn't turn the switch; right? One of those?

5 A. Yeah. He did something wrong.

6 Q. Okay. And so based on the later statement when
7 he finally fessed up I guess is the term he didn't -- the
8 rudder didn't go hard over as far as your review, right,
9 when you reviewed all the documents; is that fair to say?

10 A. Yes.

11 MR. JETT: Object to the form.

12 BY MR. RODGERS:

13 Q. And did you also review the Rose Point data,
14 you know, the computer track?

15 A. Yes.

16 Q. And would you agree that it does not on its
17 face show the track going hard left at all, it shows a
18 gradual movement to the left; correct?

19 A. Correct.

20 Q. So if as a tug captain and as an expert
21 reviewing that, would you agree supports his later story
22 as opposed to his first story which was the rudder went
23 hard left?

24 A. Yes.

25 Q. Okay. And is that -- have you ever dealt with